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August 11, 2015

Via ECF

The Honorable Katherine B. Forrest, U.S.D.J.
United States District Court
For the Southern District of New York
500 Pearl Street, Room 1950
New York, NY 10007-1312

Re: *In re Zinc Antitrust Litig.*, 14 Civ. 3728 (KBF) (SDNY)

Dear Judge Forrest:

I write as Interim Co-Lead Counsel for Plaintiffs in the above matter. On August 3, defendants each moved to dismiss Plaintiffs' Consolidated Amended Complaint. In connection with that motion, defendants each filed and served separate memoranda in support of their respective motions. If Plaintiffs were to respond separately to each of these four separate briefs, Plaintiffs ordinarily would be entitled to 100 pages. With the Court's permission, Plaintiffs would prefer to respond to all four briefs with one omnibus opposition brief, which we anticipate need not exceed 85 pages. Plaintiffs believe this one-brief approach will significantly reduce repetition that would otherwise occur if separate briefs were filed and better serve the Court's overall understanding of the applicable issues.

In making this application, Plaintiffs first sought defendants' consent, in response to which defendants asked that we include the following statement in our application: While defendants believe that the Court might find separate briefs more useful given the varying allegations against each defendant, defendants take no position on plaintiffs' request.

Given that (i) defendants do not oppose this application, and (ii) this application seeks to reduce the overall burdens on the Court, Plaintiffs respectfully request that the Court grant this application to permit Plaintiffs to file one omnibus opposition brief in response to defendants' four motion to dismiss briefs.

Respectfully Submitted,

/s Bradley J. Demuth

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